

**REMARKS/ARGUMENTS**

Claims 5-7, 12, 13, and 17-19 are pending.

The claims have been amended to address the various claim objections and the rejections under 35 U.S.C. Section 112, Second paragraph. Fig. 1 of the specification exemplifies an illustrative embodiment of the pending claims. No new matter has been added. The claims are presented in clean form in the APPENDIX attached hereto for the examiner's convenience.

The specification was objected to for allegedly failing to provide proper antecedent basis for claims 17-19, which recite computer-readable medium. However, the descriptions given beginning on page 24 of the specification describe "a program." The specification is believed to support the recited subject matter in claims 17-19 for the reason that "a program" is invariably embodied in some form of physical medium such as disk storage or computer memory, i.e., the recited "computer-readable medium."

A distinguishing feature recited in the pending claims is shown by way of example in the illustrative embodiment of Fig. 1 of the specification. A dedicated connection (350) provides a dedicated data path between the local cache 330 of one channel control unit (330) and the local of another channel control unit. In addition, a connector unit (500) provides data path separate from the dedicated data path among the channel control units (500) and a plurality of disk control units (400).

Claim 5 substantively recites in part "a dedicated data transfer path between at least two cache memories of the channel control units; and a connector unit to provide data paths among the plurality of channel control units and the disk control unit separate from the dedicated data transfer path" where in response to a write request from a host "data to be written to the cache memory of a 1<sup>st</sup> channel control unit is transmitted through the dedicated data transfer path to a 2<sup>nd</sup> channel control unit connected to the first channel control unit" to be stored in the cache memory of the 2<sup>nd</sup> channel control unit. Similar features are recited in independent claims 7, 12, 13, and 17-19.

Dewey discloses that each controller 401 (401') includes a host I/F 400 (400'), plural disk I/Fs 410-414 (410'-414'), memory I/F 420 (420'), and RAM 422 (422'). A single dump line 426 connects the memory I/Fs 420, 420'. Dewey's host I/F corresponds to the recited "channel control unit." Dewey does not show a connection between its host I/Fs 400 (400'). Dewey therefore does not show the recited "dedicated data transfer path between at least two cache memories of the channel control units; and a connector unit to provide data paths among the plurality of channel control units and the disk control unit separate from the dedicated data transfer path" where in response to a write request from a host "data to be written to the cache memory of a 1<sup>st</sup> channel control unit is transmitted through the dedicated data transfer path to a 2<sup>nd</sup> channel control unit connected to the first channel control unit" to be stored in the cache memory of the 2<sup>nd</sup> channel control unit.

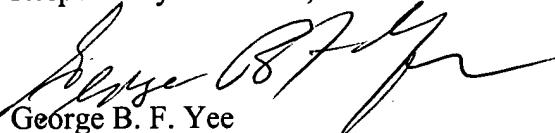
For at least this reason, the Section 102 rejection of the claims is believed to be overcome.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

  
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